

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Fiduciary Network, LLC,

Plaintiff,

v.

Mark P. Hurley,

Defendant.

Case No: 1:19-cv-00379-GHW

Oral Argument Requested

**NOTICE OF DEFENDANT MARK P. HURLEY'S MOTION FOR PARTIAL
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying: (i) Declaration of Michael J. Collins, dated June 18, 2020, and the exhibits annexed thereto; (ii) Statement of Undisputed Material Facts Pursuant to Local Civil Rule 56.1; (iii) memorandum of law; and (iv) all prior pleadings and proceedings heretofore had herein, Defendant Mark P. Hurley, by his undersigned attorneys, moves this Court for an order, pursuant to Fed. R. Civ. P. 56, granting partial summary judgment as to Plaintiff's second claim for relief (tortious interference with prospective economic advantage and business relations) and third claim for relief (injunctive and declaratory relief for tortious interference) in his favor, and against Plaintiff Fiduciary Network, LLC.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order made during a telephonic conference on May 11, 2020, Plaintiff's opposition to the motion, if any, shall be filed and served on or before July 9, 2020 and any reply papers in further support of the motion shall be filed and served on or before July 16, 2020.

Dated: June 18, 2020

Respectfully submitted,

By: /s/ Michael J. Collins

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**ATTORNEYS FOR DEFENDANT
MARK P. HURLEY**

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of June, 2020, a true and correct copy of Defendant Mark P. Hurley's Memorandum Of Law In Support Of His Motion For Partial Summary Judgment was served via electronic filing on the following counsel of record:

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By: /s/ Michael J. Collins
Michael J. Collins